

UNITED STATES DISTRICT COURT

for the

Western District of Missouri

Civil Division

Vincent Cannady

) Case No.

6-23-cv-03279

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Kyndryl, Inc,
et al

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Vincent Cannady
Street Address	17472 S 2950 Road
City and County	EI Dorad Springs and Vernon
State and Zip Code	Missouri and 64744
Telephone Number	202-253-2300
E-mail Address	vnc@rocketmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	<u>Kyndryl, Inc.</u>
Job or Title (<i>if known</i>)	<u>Global Headquarters</u>
Street Address	<u>1 Vanderbilt Avenue</u>
City and County	<u>New York City and New York County</u>
State and Zip Code	<u>NY and 10017</u>
Telephone Number	<u>855-596-3795</u>
E-mail Address (<i>if known</i>)	<u>gary.langham@kyndryl.com</u>

Defendant No. 2

Name	<u>Experis</u>
Job or Title (<i>if known</i>)	<u>Headquarters</u>
Street Address	<u>100 Manpower PI</u>
City and County	<u>Milwaukee</u>
State and Zip Code	<u>WI and 53212</u>
Telephone Number	<u>877--626-6797</u>
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	<u>Gary Langham</u>
Job or Title (<i>if known</i>)	<u>Director</u>
Street Address	<u>1 Vanderbilt Avenue</u>
City and County	<u>New York City and New York County</u>
State and Zip Code	<u>New York and 10017</u>
Telephone Number	<u>855-596-3795</u>
E-mail Address (<i>if known</i>)	<u>gary.langham@kyndryl.com</u>

Defendant No. 4

Name	<u>Markus W. Engle</u>
Job or Title (<i>if known</i>)	<u>Associate Director</u>
Street Address	<u>1 Vanderbilt Ave</u>
City and County	<u>NYC and New York County</u>
State and Zip Code	<u>New York and 10017</u>
Telephone Number	<u>678-812-3333</u>
E-mail Address (<i>if known</i>)	<u>markus.engle2@kyndryl.com</u>

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

- Federal question Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1st Amendment Freedom of Speech and Freedom of the Press, 6th Amendment, 14th Amendment, Americans with Disabilities Act, 38 USC Section 4311, 15 USC Section 1692d, 28 USC Section 4101, Title VII Civil Rights Act of 1963, 15 USC Section 2087, 12 USC Section 93

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* Vincent Cannady, is a citizen of the
State of *(name)* Missouri.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)*
_____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (*name*) Kyndryl, Inc, is incorporated under the laws of the State of (*name*) New York, and has its principal place of business in the State of (*name*) New York. Or is incorporated under the laws of (*foreign nation*) Global Company, and has its principal place of business in (*name*) United Kingdom.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

9,999,999.99 because the Company violated the Plaintiffs Free Speech and Freedom of the Press Rights, Seeks to make the Plaintiff represent himself without an Attorney, Seeks to GAG the Plaintiff from discussing facts of the companies malfeasance, mismanagement, complicity, and violations of Law protecting American Citizens and their own investors from cyber crime

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

The Plaintiff as part of a story he was going to write about corruption in US Corporations was terminated from employment so the Plaintiff downloaded evidence that he has as part of his former job to fight cyber Vulnerabilities at Kyndryl. The Plaintiff offered Kyndryl a chance to settle so that he would have restitution for the harm Kyndryl had done to his reputation and income but instead Kyndryl sued the Plaintiff in Missouri and immediately files a TRO seeking to stop Plaintiff from placing the damning documents in the public realm. Plaintiff had already informed the SEC of wrong doings and requested Whistleblower protection. Defendant submitted an amended TRO motion for complete gag of speaking or even filing in this Court without the permission of Missouri Court

B. What date and approximate time did the events giving rise to your claim(s) occur?

First date was June 19th, 2023, Second date was July 13th 2023, third date was August 1, 2023 and fourth date was August 8, 2023

- C. What are the facts underlying your claim(s)? (For example: *What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)

I have had my Free Speech and Freedom of the Press Rights Removed by the US District Court in Missouri. I have been libeled by the Defendant calling the Plaintiff a Thief for downloading work that he had either done, supervised or collaborated with other Kyndryl employees or contract. I have been sued to keep me quiet. Kyndryl employees violated my civil rights with discriminatory behavior and fire me for refusing to bow to their racist authority (Markus Engel saying you will get in line (only missing the word BOY)). Kyndryl suing me for sending a settlement email. Illegal Computer access by Kyndryl hacking my home computers. The biggest one seeking to Amend the Temporary Restraining Order to not allow Free Speech and not to allow communication with the Media or to communicate with American or Internal Regulators to provide regulators with the documents I have of Kyndryls intentional Risk Acceptance, mismanagement, and corrupt behavior. They seek to silence me by any means

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

I am unemployed because Kyndryl and Experis have slandered me on applicant tracking systems such as Workday. I have had many companies interested in me then simply disappear and one even hinted that a contact with Experis was the reason for their withdrawal. I am a 100% disabled veteran who was recently approved for Disability Social Security because of my severe illnesses, disorders, and disabilities. I have life threatening injuries from my service to the Nation as a US Army Soldier, I could die any day from ailments if not treated properly and from stress. I suffer from PTSD Induced SVT or very rapid heart rate due to stress or anxiety. Kyndryl knows this and is using the Court in Missouri to cause INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Reputation damages by filing a lawsuit against in a public shaming without disclosure of why I was sued-\$,3,000,000

Freedom of the Press to Write about the Vulnerabilities to Cyber Attacks keeps me from printing on my blog or Washington Post of KC Star- I have written news articles for Yahoo News, Yahoo Sports, and Yahoo Business in the past as a recognized Yahoo Contributor cost-\$3,000,000.

Seeking to Gag me from contacting the SEC, Federal Banking Auththat cannot be undone by priority, and other regulators such as the GDPR regulators of the EU, as a person who witness malfeasance and crime (RICO) I am required by Law to tell what I have seen or produce documents that I have to said regulators- the Order seeking to gag me from talking to regulators is causing me health related problems due to stress and my heart rate- \$3,000,000

Racial and Disability Discrimination amounts is due to punitive damages that cannot be undone- \$1,999,999.99

VI. Certification and Closing

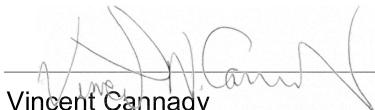
Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 09/10/2023

Signature of Plaintiff



Printed Name of Plaintiff

Vincent Cannady

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address
